

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

**Case No.: 1:25-cv-20757-JB/Torres**

JANE DOE,  
Plaintiff,

v.

STEVEN K. BONNELL II,  
Defendant.

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**DECLARATION OF ANDREW B. BRETTLER**

I, Andrew B. Brettler, declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney admitted to practice *pro hac vice* in the above-captioned action. I am a partner at the law firm Berk Brettler LLP in West Hollywood, California. Along with our local counsel at Bilzin Sumberg Baena Price & Axelrod LLP, we represent Defendant Steven K. Bonnell II. I have personal knowledge of the matters contained herein and if called upon to testify could offer competent testimony thereto.

2. I submit this Declaration in support of Defendant Steven Bonnell's Motion For Sanctions Pursuant to Fed. R. Civ. P. 11, filed concurrently herewith.

3. Attached hereto as **Exhibit A** is a true and correct copy of excerpts of the transcript of the deposition of [REDACTED], dated October 23, 2025.

4. On October 30, 2025, I sent a letter to Plaintiff's counsel demanding that Plaintiff file a notice of errata and corrected pleading to retract Plaintiff's knowingly false allegation contained in her Opposition to Bonnell's motion to dismiss. To date, I have received no response.

A true and correct copy of my October 30, 2025 letter to Plaintiff's counsel is attached hereto as **Exhibit B**.

5. On November 7, 2025, I served a copy of this Motion for Sanctions and supporting documents on Plaintiff's counsel by email. A true and correct copy of my email to Plaintiff's counsel, enclosing the Motion papers is attached hereto as **Exhibit C**. The 21-day safe harbor period under Rule 11(c)(2) expires on December 1, 2025.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on December 1, 2025.

s/ Andrew B. Brettler  
Andrew B. Brettler